

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA                     )  
  )  
VS.   ) CASE NO. 02:06cr144-WKW-SRW  
  )  
PAUL MEREZ GRAHAM                                 )

**MOTION TO CONTINUE**

Comes now Defendant Paul Merez Graham, by and through counsel, and shows  
as follows:

1. The undersigned counsel entered his appearance in this case on August 4, 2006.
2. The defense filed a motion to suppress on August 10, 2006.
3. A superseding indictment was filed on August 15, 2006. Arraignment on that indictment is scheduled for August 30, 2006.
4. The undersigned counsel received discovery materials relating to the new charges in the superseding indictment on August 23, 2006. The undersigned counsel anticipates filing an additional motion to suppress relating to the new charges.
5. This case is currently on this Court's September 18, 2006 trial docket.
6. Additional time is needed to properly and reasonably handle these pre-trial motion matters and other matters attendant to the preparation for a trial.
7. Defendant Graham's waiver of a speedy trial until the October 30, 2006 term follows this motion.

WHEREFORE, Defendant Paul Merez Graham moves this Court to continue the trial of this case to the October 30, 2006 trial term.

**s/ Thomas M. Goggans**

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Attorney for Defendant

Paul Merez Graham

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**CERTIFICATE OF SERVICE**

I hereby certify that I have on this the 29th day of August, 2006, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such to the following: **Tommie Brown Hardwick, John T. Harmon, Christine A. Freeman**

**s/ Thomas M. Goggans**  
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Attorney for Defendant  
Paul Merez Graham

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**WAIVER OF RIGHT TO SPEEDY TRIAL**

The undersigned defendant, Paul Merez Graham, after being advised of his right to a speedy trial as guaranteed him by the Sixth Amendment to the United States Constitution and the implementation of said right in 18 U.S.C. § 3161, hereby waives his right to a speedy trial as to the September 18, 2006 until the October 30, 2006 trial term.

  
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Paul Merez Graham